

Green Zones Program



Green Zones Program Public Discussion Draft Ordinance East LA Community Outreach Meetings Questions and Comments Received on July 6 and July 16, 2020

Questions

Similar questions have been grouped together for response.

Q: How many existing businesses will be affected in East LA? Will they have to close if they cannot afford these new regulations? Have these businesses been informed?

Response:

We have estimated approximately 450 businesses in East LA will be impacted by new Green Zone regulations. This number is being verified since some businesses turnover quickly. Once we have a final list, we will reach out individually to each property owner. We will have a phased outreach approach to notify businesses of proposed changes. Similar to all members of the public, the businesses currently have the opportunity to comment on the draft Green Zones Ordinance and participate in public hearings. We will also follow up with businesses once the ordinance is adopted to ensure they are aware of the changes and working toward compliance.

We are looking into business incentives and support programs that might help small businesses comply with the new regulations.

Q: Hay negocios que rentan la propiedad, quien tiene la responsabilidad de limpieza el dueño del edificio o propiedad o van a poner este cargo adicional al dueño del negocio? (There are businesses that rent the property. Whose responsibility is it to clean up the building or the property? Or will the additional charge be put on the business owner?)

Response:

Ultimately it is the property owner's responsibility to comply. A property owner might pass the costs down to the business owner who is operating if the business is in violation.

Q: Does the Green Zones program incentivize *more* landscaping and green space on properties as compared to what is required today? Thank you.

Response:

The Green Zones Program will require additional landscaping buffers on specific industrial, recycling and solid waste, and vehicle-related uses when they are within 500 feet of a sensitive use as defined by the draft Green Zones ordinance. There are no incentives established through the Green Zones Program at this point, though we will provide information found in other established programs to help businesses comply.

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Q: If the landlords are responsible for the repairs, why are we targeting businesses? Most of the businesses lease. Have you started communication with the landlord of those commercial spaces?

Response:

The property owners will be notified in our proactive outreach. We are discussing business types as they relate to the use of the land. This helps the public understand what type of land use will be subject to new requirements. However, the property owner has the discretion to determine what type of land use or business exists on their property.

Q: Who will be doing any clean up? What if land needs to be cleaned? I understood the program was to bring to an environmental standard.

Response:

The Green Zones Program is not a clean-up program. It is intended to improve compatibility of industrial businesses or land uses next to residential and other similarly sensitive uses through Zoning Code changes. If a property requires clean-up, we would need to coordinate with the appropriate agency with the authority and expertise to monitor any clean-up.

Q: The presentation mentioned an incentive program for businesses. Is there any funding identified to support this type of program?

Q: Will there be any grants to help small businesses comply?

Q: Yes, if they are given more time because the process can be expensive, is there no program in place to aid them financially to speed up their time to become compliant?

Response:

We are looking into existing programs that could help support businesses in making “green” improvements. This information will be part of the Green Zones Program implementation. We will consider ways to help expedite the permitting process as part of this Program.

Q: Can you elaborate how this impacts multi-family units? Really quick mention in the presentation.

Response:

The proposed Chapter 22.128 (Storage Enclosure Requirements for Recycling and Solid Waste) applies to any new multi-family development with four or more units or any existing multi-family development with four or more units that expands by 50% or greater of the existing floor area. It also applies to all new, non-residential development or existing non-residential development that expands by 50% or more of the existing floor area. The requirement is for recycling and solid waste receptacles to be located in an enclosed area that is accessible by residents, employees, and refuse or recycling haulers at all times. There are also distance requirements from doors or windows, height requirements, paving, and signage requirements, etc., to protect the residents and/or employees from odor, noise, or other potential impacts associated with waste and recycling receptacles.

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Q: After hearing the presentation, the compliance time frame was concerning, especially for a ten-year compliance. This would mean as an elementary school student to a high school student I will see change. So why ten years? Second, for a permitting process who will be issuing violations for noncompliance, and will there be a community process for the permits?

Q: Schedule for Compliance in Green Zone. Can you elaborate on the required signage for businesses? I would like to know why businesses have 3 years to put up a sign. Is this a simple sign or something on a much larger scale? The timelines, 3 years, 5 years and 10 years seem extremely generous.

Q: Will there be another effort in the meantime for business that need to comply with the 3 and 10 years compelled compliance timeframes?

Q: I was wondering why enclosure takes 10 years for sites, especially those closest to sensitive use sites, as the table showed in the presentation?

Q: I have a 10 year old right now, so he will be 20 to even see a change with some. Irreversible damage to health can happen in 10 years, 3 years is too long. That is also expensive for residents. Appropriate technology was mentioned, can you go into more detail as to what those are?

Q: Who determines if an existing company is given 3, 5 or 10 years for compliance?

Q: We can't wait for 10 years. How can we request a shorter time?

Q: Why is the timeline favoring the business and their expense...?

Q: Would business need to complete upgrades in phases within those 10 years? otherwise many can just keep polluting and then leave. 10 years is too long.

Q: Who decided the timeline?

Responses:

The compliance timeframe in the draft Green Zones Ordinance has been determined by the type of permit and improvements required. Ten (10) years is the maximum amount a time a business would have to *not only* obtain the appropriate County permits, but also to complete construction and installation of any walls, air filtration systems, landscaping, and/or building enclosures. Some requirements may require construction or installation in 3-5 years, depending on the type of improvements required.

Within proximity to sensitive uses, the compliance timeframe is shorter. For example, if a business requires a CUP and is required to make improvements including signage, walls, and/or landscaping, AND

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the business is within 0-100 feet of a sensitive use, they only have 5 years to comply. This is proposed in the draft Green Zones Ordinance in Section 22.84.040 (Schedule for Compliance for Existing, Legally-Established Uses) on page 50 of the PDF located on our website at <http://planning.lacounty.gov/greenzones/documents>.

Any requirements that can be fulfilled with a Ministerial Site Plan Review and do not require a public hearing, will need to comply within 3-5 years. However, when full enclosure of operation is required, we are proposing 10 years. We have heard comments that this may be too long for an enclosure requirement.

An outreach meeting for businesses has been scheduled for August 12th. After ordinance adoption, we will meet with businesses again. We will also work collaboratively with other County agencies for a coordinated approach to bring businesses into compliance.

The Department of Regional Planning Zoning Enforcement Section is responsible for issuing notices of violations and ensuring compliance with the Green Zones Ordinance. The best way to contact them right now is through dialing the County Helpline, 211 or via email at zoningenforcement@planning.lacounty.gov.

Any land use (business) that requires a Conditional Use Permit (CUP) would have to go through a discretionary process. The discretionary process requires public noticing and a public hearing before a Hearing Officer or the Regional Planning Commission.

All of the comments and concerns regarding the compliance timeline for businesses will be considered for the next draft of the Green Zones Ordinance.

The Green Zones Program was initiated by the Board of Supervisors in 2015. The Program aims to fulfill directives issued by the Board of Supervisors and to address State Senate Bill 1000, which requires that local jurisdictions add an environmental justice element to their General Plan or incorporate environmental justice goals, policies, and objectives into other elements of the General Plan. As part of the Green Zones Program, we will be including environmental justice policies and information, including the Environmental Justice Screening Method into the General Plan.

Q: Is there a way to speed up the permit process from the government side?

Response:

We will explore the possibility of an expediting process for high-priority cases that have significant impacts on the community that need to be mitigated.

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Q: How was the 500 feet for regulations determined.? Exide's contamination reached as far as 1.5 miles. Can we increase the amount beyond 500 feet for sensitive land uses?

Response:

Currently 500 feet is recognized by many public health experts (including California Air Resources Board) as the minimum distance where one can start to see particulate matter significantly reduced. This provides some justification that can be presented to the Board of Supervisors for why we recommend this as a starting point. It is important to have a starting point for the Green Zones Ordinance, which is the first of its kind for the Regional Planning Department. This provides a goal that is supported by research and enforceable. As we gather more evidence, we may be able to expand the buffer.

Q: What will happen to existing businesses that are already 500 feet from sensitive uses?

Response:

Existing businesses will be made aware of the proposed new standards and will have a chance to submit public comments on the draft ordinance as well as voice their comments or concerns at the public hearings. They will have the same opportunity to participate in the process as the general public. Once the ordinance is adopted, they will be required to comply with new development standards and permitting requirements and we will do outreach to make sure they are aware of the new standards and timelines.

Q: Why are businesses not notified yet?

Response:

We are hosting an outreach meeting on August 12, 2020 specifically for the business community to listen to proposed changes and voice their comments and concerns or ask questions. The ordinance is in the initial public review draft stage. The results of these outreach meetings will feed into an updated revised ordinance that will go to decision-makers for a public hearing. Everyone, including businesses are able to comment on this draft as well as the public hearing draft.

We will also be doing targeted outreach to specific property owners once we confirm the businesses that will be impacted. This outreach will continue throughout the ordinance development and adoption process as well as after it is adopted.

Q: What about unpermitted recycling businesses, for example, mobile recycling and metal junk trucks that are dangerous?

Q: Will the trucks that collect junk and park on Humphreys, Sydney and Gratian in Unincorporated East Los Angeles have to comply? They have exploded, had chemicals leaking, dropped their load and dropped junk off their trucks. They often have junk piled 14 feet high on residential streets. Residents have been hurt. How will the law be enforced for unpermitted businesses?

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Response:

If it is a mobile business that operates in the public right-of-way, the Department of Regional Planning does not have the authority to regulate them but the Department of Public Works Street Maintenance or the Sheriff's Department may be able to regulate them. Please call the County Helpline at 211. This does not automatically include clearing any tents, RVs, or informal housing structures that the homeless population may set up in the road right-of-way. However, if a mobile business is operating, or loading/unloading materials at specific properties, Regional Planning would regulate the uses that are on-site on private property.

Q: Yo veo que los sitios que están entre 500 pies de un sitio contaminado (Superfund site) va necesitar en cumplir con un Phase 1 reporte - será posible en requerir un Phase 1 para todos los nuevos usos? I read in the draft ordinance (page 41) that new uses within 500 feet of a Superfund site will be required to submit a Phase 1. Would you consider adding this requirement for all new uses (that qualify as a "use") in the GZ district regardless of the 500 ft. Proximity to a Superfund site?

Response:

That is not currently required in the ordinance, but we will consider this recommendation.

Q: Can you elaborate on the processes (and county staff) in place to implement zoning changes. Also, who is the regulating body that will hold existing businesses accountable to comply with regulations?

Response:

For Zoning Code changes, the Department of Regional Planning must go through a public process, such as the one we are doing with the proposed Green Zones Program. It requires public outreach, opportunity for the public to comment and inform (or oppose) the changes, and public hearings with the Regional Planning Commission as well as the LA County Board of Supervisors.

The Department of Regional Planning is the enforcement agency for any Zoning Code regulations and will address violations as it relates to any permits approved by the Department. We also work with Fire, Public Works, and Health to address violations that may relate to their requirements. We are also working to establish new relationships with AQMD to make proper referrals of violations to their regulations.

Q: If businesses violate the new standards. Will there be fines imposed? If fines will be applied, what happens to these funds? Is it possible to create a community mitigation fund?

Response:

The Department of Regional Planning assesses "non-compliance fees" and "administrative penalties" for fee recovery. The funds support the ability to enforce with the violation as necessary. A violator may be referred to the District Attorney at a specific stage of the enforcement process. For more information

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about our zoning enforcement process, please click on the following link:

<http://planning.lacounty.gov/ze>.

We will consider the recommendation to create a community mitigation fund. Thank you.

Q: What does the business operating process look like if they do not have a permit? What are they allowed to do on site? What exactly is required for them to become permitted?

Response:

A business or land use that requires Regional Planning approval cannot operate until permits are obtained, and generally an application for Regional Planning permits will not be accepted until violations have been cleared. Once a property is clear of violations, they must submit their application and all required materials to Regional Planning in addition to any other regulatory agencies before they can begin operation.

Q: Has Whiteside St in 90063 been identified as area to be studied?

Response:

Yes, the Whiteside area was a part of our groundtruthing efforts where residents and community members helped us survey existing businesses and provide information of the current issues they wished to address.

Q: who can the resident call if they are concerned with violators?

Q: what number can we call for compliance or violations?

Response:

Please contact our Zoning Enforcement by email to zoningenforcement@planning.lacounty.gov. You can also report violations by dialing 2-1-1 (LA County's help line) and they will forward the complaint to the appropriate agencies.

Q: You mentioned you are relying on [the] community to monitor. What if people move? Who is the constant on the issue? What if people in the agency change jobs? It would be unfair to create Green Zones and have absolutely no power for change.

Response:

We recognize this challenge. Once a violation is confirmed with our department, we will continue to follow up until the property/business can be brought into compliance. This also confirms the importance of residents and community members organizing to hold us accountable so that their collective community experiences and knowledge remains at the forefront.

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Q: Where do we go for permits?

Response:

Application information is available at <http://planning.lacounty.gov/apps>. For applications that have already been filed, have the case number (on your receipt) ready and contact: The Land Development Coordinating Center (public counter) at (213) 974-6411

Q: We have seen that citations do not work and agencies do not follow up. What guarantee will be provided that changes will be made within that "10 year allowance"?

Response:

Regional Planning will follow up on any confirmed land-use violations that can be regulated through the Zoning Code. As part of the Green Zones Program, Regional Planning is in the process of assembling a Green Zones Implementation Guide that will clearly lay out implementation strategy, including cooperating agencies' roles and timelines. This will be posted on the Green Zones website for transparency and accountability. This will also ensure that in case of staff turnover, new staff will have the Implementation Guide to continue the work established through this process.

Q: Considering the contamination issues from business that have historically have polluted like Exide who's pollution has been detected miles away from its epicenter: What efforts will be in place to require the proper owner to clean any pollutants that they are responsible for off property as well as compliance with the newly imposed standards?

Response:

The Department of Regional Planning can only regulate businesses on private property. However, we did consider the cumulative impacts of businesses on nearby sensitive uses, which is what informed the 500-foot radius for applying standards to businesses within 500 feet of a sensitive use. If additional clean-up is required off site, that will require collaboration with the regulatory agency that would be responsible for ensuring violations are addressed depending on what the pollutant is. For example, if it is related to air quality and particulate matter, AQMD would need to regulate those concerns, and we are currently working on methods of collaboration with them.

Q: Why can't businesses be shut down to make these changes, that should be policy. If businesses do not meet the standard why allow them to continue to HARM, community? You do not seem to understand that communities are constantly living in compromised environments from polluters.

Q: Yes to what Guadalupe said! Why can't businesses be shut down to make these changes?! Must be nice to be a business! All my bills accumulate late fees after 10 days. My certifications get cancelled the day of and that doesn't consider renewal fees and retesting required.

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Response:

If a business is unable to comply with the required standards and obtain required permits, they will not be permitted to continue operation. The Department of Regional Planning does have the ability to refer cases to the District Attorney's office if all other enforcement methods have been exhausted without compliance.

Q: How will the public know what businesses you talked to about this whole green zone? we need transparency

Response:

All of our meetings are public. Please visit our website at <http://planning.lacounty.gov/greenzones/meetings> for meeting information.

The Green Zones Program process will consist of notifying all property owners that will be impacted by the ordinance prior to the final ordinance going to public hearing. After the ordinance is adopted by the Board of Supervisors, we will conduct additional outreach to ensure property owners are aware of the compliance schedule.

Q: Will the ordinance seek to create actual green areas for residents? e.g. park, garden, dog park

Response:

No. There are no proposed public green spaces as part of this project. The Green Zones Ordinance aims to address incompatible land uses by establishing more stringent development standards on high-impact businesses when in close proximity to sensitive uses. New requirements include additional landscaping buffers and tree planting for specific properties depending on the use that is proposed on the property and its proximity to a sensitive use.

Q: Will this new law impact closed dump sites? For example, the two City Terrace dumps and the closed dump off of 2nd and McDonnell?

Response:

The new requirements will not apply to existing landfills, but will apply to any expansion portion of an existing landfill. Closed landfills are regulated by the conditions and/or mitigation measures approved for post-closure use. Please contact us with specific addresses of landfills for further investigation or specific questions.

Q: Can you talk about AQMD and how they monitor emissions? Perhaps you can also mention the AB 617 and how they have started that program in ELA.

Q: How can we get an air quality monitor stationed in our community?

Response:

The AB617 program effort is not being led by the Department of Regional Planning. AQMD attended the July 6, 2020 Green Zones community meeting and responded to this question by providing information

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on how they monitor emissions with community monitors. They also provided information on AB 617 and the timeline for EAST LA's Community Air Monitoring Plan (CAMP) and Community Emissions Reduction Plan (CERP). More information is available here:

<http://www.aqmd.gov/nav/about/initiatives/community-efforts/environmental-justice/ab617-134/east-la>

Please contact AQMD regarding air quality monitors for the community. Visit aqmd.gov

Q: Walnut Park residents have concerns over a new low income housing project who can help? What department?

Response:

This project is not within the scope of the Green Zones Program. For more information, please contact zoningldcc@planning.lacounty.gov with the property address or Regional Planning Case Number.

Q: Will there be any further outreach to the community beyond the next 2 meetings and this meeting?

Q: Will we automatically invited or will I have register to join meeting? Will we be receiving email reminders?

Response:

There are 6 more meetings planned beyond this July 6, 2020 meeting. There will be an additional meeting focused on the East LA community on July 16, 2020. There will also be two meetings to discuss the environmental impacts of the proposed project and gather input on an Environmental Impact Report. Those will be on July 13, 2020 and July 22, 2020. Additional ordinance outreach meetings are planned for July 27, 2020, July 30, 2020 (which will be presented in Spanish), and August 12, 2020. All meeting information is available on our website at <http://planning.lacounty.gov/greenzones/meetings>.

We ask participants to register for all upcoming meetings in advance. Registration information can be found on our website at <http://planning.lacounty.gov/greenzones/meetings>. We send periodic email blasts with project updates including upcoming meeting information. We will also be posting reminders on social media (Facebook, Twitter, and Instagram). Follow us @LACDRP.

Q: Can we get a copy of the presentation, I missed the first half, I wasn't aware that there was a breakthrough room for the presentation?

Response

The presentation has been emailed to everyone who registered for the meeting and it is also available on our website at <http://planning.lacounty.gov/greenzones/meetings>.

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Q: Can you carry the comments over that were not responded to today to the next meeting?

Response:

Responses from July 6th and July 16th meetings are all combined on this sheet. For additional questions please email us at greenzones@planning.lacounty.gov

Q: To clarify, will the comments shared here (in the meeting chat box) NOT count? I was under the impression comments on this chat would be taken into account as public comment for this plan.

Response:

The comments during these public meetings will absolutely count and be added to the public record. They will all be considered as we revised the public draft ordinance. In addition to the meetings, public comments can be submitted by email to greenzones@planning.lacounty.gov or by mail to:

Tahirah Farris
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90027

Q: Thank you all for the presentation. Can you provide a guide, or in upcoming presentations, dive deeper into Conditional Use Permits process related to these proposed changes? Describing the flow of application process, review, and who ultimately (department, personnel, etc.) that approve those permits. It would be good to know this process, so that the public may raise comments or concerns.

Response

Yes, we will share more information on the permitting process at our upcoming meetings and we will provide a visual informational sheet on our website at <http://planning.lacounty.gov/greenzones/documents>.

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Comments for the Record

Below is a list of comments received during the July 6 and July 13 public meetings that have been noted for the record. All comments received will be maintained as part of the public record and will inform revisions to the draft ordinance.

- 1) 10 years is too long.
- 2) A permit process might seem “expensive” but our health is never compensated for.
- 3) I agree with Janet and others our health can't wait 10 years... we are losing our health in the expense of business owners.
- 4) Agree with commenters - 3/5/10 years is too long. Would like to see an "expedited" process for businesses to comply, maybe creating a special unit within agencies tasked with assessing compliance.
- 5) Who will be giving incentives to the residents living in highly toxic areas?
- 6) 10 year's is where you make this not make sense
- 7) Exactly, it doesn't take 10 years to put a roof on a pallet yard
- 8) ELAC has taken more than 20 years
- 9) The Board members represent us WE the board and county that need to look out for lives over profits and capitalism.
- 10) Some businesses release odors in the air. These businesses were supposed to enclose their business to keep the smell from escaping. They are not complying so why would these businesses comply too?
- 11) Timelines are unacceptable. I propose 1 year to put up a sign, if it's a basic sign. A sign does not cost 100's of thousands of dollars. 3 years for the walls and landscaping etc. and 5 years for Enclosures. Specifically, for businesses with contaminants spread through the air which will harm residents. Businesses like the cement coffin container manufacturer on 3rd Street between Eastern and Humphreys as Clara mentioned should have shorter time than 10 years to comply. I strongly believe the timelines should be shortened because we have to live with it and get sick. Landlords/Tenants like the Coffin place do make thousands and can comply. They don't make very little money as previously mentioned. They wouldn't be in business for 20, 30, 40, 50 years if they didn't make money.

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- 12) I agree with the others. The timeline does seem too generous. Many have already been suffering for many years from the impact of pollution. For example, residents on Humphreys and 3rd Street have complained for decades about the dust from a factory that makes cement coffin containers on 3rd Street (between Humphreys & Eastern.). AQMD pretty much ignored residents' complaints. Saying cement was organic.
- 13) Most businesses will wait until 9 years & the 11th month.
- 14) Yes, especially the noise & dust violators
- 15) Because they pay taxes a lot and they have rights also (in response to a question of "why is the timeline favoring businesses and their expense...")
- 16) Let's also remember a lot of residents have lost health care due to Covid-19 and their health is not in good standing as well.
- 17) A comment on when new uses are proposed in the GZ districts: Ministerial reviews like SPR really defy the intention and struggle behind EJ and green zones. Please consider voiding any SPR review regardless of the underlying zone allows the use via SPR. If possible, please consider (along with your County counsel) if you could use the ordinance's EIR to create a list of MM's across all GZ districts so that even SPR's have some teeth in enforcing precaution (i.e. asking for soil studies or air studies or travel count analyses) for large new uses.
- 18) I don't want my tax payer's dollars to pay for business' responsibility.
- 19) The more important it is to public and take a stand with DTSC.
- 20) Let's also remember that business is not in good standing [because] of Covid-19.
- 21) Businesses are running still... in the City Terrace area... no one has stopped because of Covid-19.
- 22) Regional Planning needs to work with AQMD to do enforcement. Stop working in silos.
- 23) Deeds and trusts are also in place and most have locks on the zoning.
- 24) I'm surprised the identified business are not aware of their businesses impact on the environment.
- 25) [Someone] stated since they pay a lot of taxes they have rights.... so human lives don't matter ... because we don't contribute to a lot of taxes....
- 26) The dump sites are both in Unincorporated East Los Angeles.

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- 27) There are some businesses in my area that don't have a permit. I'm sure there are many others in ELA, Firestone & walnut park. Why not shut them down? Planning needs to do an audit and start with the low hanging fruit.
- 28) Please download this chat and review the questions being asked to know what we are expecting the next meeting you host.
- 29) To report air quality issues, call 800-cut-smog. To report odors or toxins.
- 30) I've been calling 1-800 CUT SMOG for 6 years now and the rendering plants continue to emit horrid odors on a daily basis. The algorithm is either off or the agency is negligent.
- 31) Current enforcement rules through planning and AQMD have clearly been ineffective. We need change.
- 32) People vs businesses.
- 33) Our lives matter.
- 34) There needs to be a moratorium on new industrial businesses citing in our Green Zone community. Many bad actor businesses are or have already rushed to build in front of any land use protections for our communities. We are West Carson community. This plan needs to be strengthened. Oversaturated communities do not need more mitigated conditional uses in our communities. We expect a lot more from this plan. What is the plan for correction of the businesses that lead to the problem. Compliance is too long 5 and 10 years, our lungs need relief now.
- 35) Land use planning has failed our environmental justice communities. Time to be firm and protective of our vulnerable communities' members.
- 36) I second that, 3 years to put a sign up is LAUGHABLE, but 10 years is Insulting to the families living in these areas.
- 37) Regional planning enforcement should be initiated by Regional planning, not residents. Regional Planning should be conducting inspections regularly to confirm that these businesses are in compliance. Again, this shouldn't be up to residents to report things.
- 38) We get this conditional use permits to mitigate non-compatible business then on top of that we are required to hound the government to do their job but then become the enforcers with badge.
- 39) Developer corruption, how rampant is it?
- 40) How can we achieve environmental justice when the process is rigged?

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- 41) The legacy we are leaving our children.
- 42) Get rid of CUPs. Hear us now.
- 43) AQMD with ab617 is implementing rules that will be in affect this year and actions are ongoing.
- 44) Solis office and other Supervisors: can you speak to a moratorium on development in identified green zones communities or a process to discuss this issue?
- 45) We need to address areas where land use plans collide. Cross jurisdictional needs to happen.
- 46) Yes! many of us live on the border of unincorporated areas and cities that are bad actors.
- 47) No apologies, this is a matter of life and death.